

**EXHIBIT 14**

**TruePosition, Inc. v. Andrew Corporation, No. 05-747-SLR  
 TruePosition's Objections and Counter Designations to  
 Andrew's Deposition Designations For Its Case-In-Chief**

Deposition of Robert L. Gross October 12, 2006		
Andrew's Designations	TruePosition's Objections <sup>1</sup>	Counter Designations
4:6-8		
13:2-21		
14:2-7		
14:11-13		14:14 – 15:06
19:14-20:15		18:18 – 19:13
21:17-22:12		20:25 – 21:16
25:24-26:21		27:3-18
31:2-5	Foundation, Speculation	30:05-25 31:6
31:7	Foundation, Speculation	31:8-9
31:10-14	Foundation, Speculation	
31:17-20	Foundation, Speculation	
33:22-25		
34:18-22	Scope, Foundation	34:23 – 35:4
36:12-23		36:24 – 37:10
37:11-14		37:15-20
37:21-38:3		38:4-9 40:15-41:13 43:7-16
50:23-51:23	51:18-23 – Speculation	45:23-50:22
53:17-20	Speculation	53:21-22

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<sup>1</sup> TruePosition objects to each designation as irrelevant to the extent Andrew seeks to use such designations in connection with the issue of claim construction.

53:23-54:3	53:23-24 – Speculation 53:25-54:3 – Relevance	
54:9-56:4		56:5 -57:25
68:9-21	Hearsay, Relevance	67:10-68:8
68:25-69:8	Relevance	68:22-24, 69:9-11
71:18-72:7		70:11-71:18
72:8-13		72:14-15
72:16-22		
72:25-73:5		73:6-7
73:8-13		73:14-15
74:4-11	Foundation	74:12-14
76:20-24		76:25-77:4
77:5-6		
77:20-22		77:23-24
77:25-78:6		78:7-9
78:10-15		78:16-19
78:20-24		
81:21-83:11	Relevance	115:10-117:09
84:9-86:24	Relevance	86:25-87:2
87:3		87:4-5
87:9-89:2	Relevance	
91:8-21	Relevance	
93:14--94:3		94:4-8
96:18-20	Relevance	

Deposition of Curtis A. Knight October 6, 2006		
Andrew's Designations	TruePosition's Objections <sup>2</sup>	Counter Designations
13:17-14:5		

<sup>2</sup> TruePosition objects to each designation as irrelevant to the extent Andrew seeks to use such designations in connection with the issue of claim construction.

14:8		16:6-17:3; 17:5
17:7-9		
17:11-17		
17:19-25		
18:6-13		
18:15-21		
19:13-17		
19:23-20:7		
20:24-21:4		
22:1-5		
22:12-16		
22:18-23:6		
23:8-11		
23:15-16		
25:24-26:10		
26:12-25		
27:2		
27:4-11		
27:13		
27:15-16		
27:18		
41:19-20		
41:22--25		
42:12-42:25		
65:3-6		
67:14-18		
68:24-25		
69:2		
75:18-21		75:5-17
75:23-25		
77:1-8		

80:2-11		
80:16-20		
80:22		
89:3-8		
89:25-90:13		
91:24-92:1		
92:3-8		
93:11-20		
93:22-23		
94:9-15		
94:17-95:1		
97:12-14		
97:16-18		
97:20-21		97:23-98:1
103:24-25		
104:2-3		
133:24-134:4		
145:7-8		
145:11-15		159:5-6; 159:8-11
161:19-162:8		
162:10-16		
162:18-19		
165:13-14		
165:17-18		
172:8-9		
172:11-15		184:20-185:7; 185:10-15; 185:18-21; 185:24-186:2; 186:5

Deposition of Oskar Magnusson Individual Capacity November 8, 2006		
Andrew's Designations	TruePosition's Objections <sup>3</sup>	Counter Designations
6:8-10		
6:24-9:1		
10:2-5		
11:10-21		11:22-12:11
12:12-13:12		
44:9-18		
44:20		
44:22-25		

Oskar S. Magnusson - Andrew Corporation Corporate Designee Second Rule 30(b)(6) Deposition November 8, 2006		
Andrew's Designations	TruePosition's Objections <sup>4</sup>	Counter Designations
8:6-13		
40:8-10		
40:21-25		
41:20-42:21		
59:6-14		
74:4-24		
81:10		81:3-7
121:5-7		121:05-121:10; 122:9-122:16
121:11-122:8		
124:5-132:18	Relevance	162:20-163:18; 163:22-164:7, 164:10-15

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<sup>3</sup> TruePosition objects to each and every designation of Mr. Magnusson's testimony as hearsay.

<sup>4</sup> TruePosition objects to each and every designation of Mr. Magnusson's testimony as hearsay.

164:21-165:16	Relevance	171:17-23
170:24-25-171:16		175:4-16
173:23-25-175:3		
175:17-25-176:25		
176:2-25		
189:5-7		187:24-188:16; 188:19-25
189:9-190:4	Hearsay	190:5-21; 190:24-191:3

Oskar S. Magnusson Testimony Given In Individual Capacity In Second Rule 30(b)(6) Deposition November 8, 2006		
Andrew's Designations	TruePosition's Objections <sup>5</sup>	Counter Designations
146:6-147:7	Relevance	
147:21-148:13	Relevance	
148:16-25	Relevance	149:2-5; 149:9-150:7; 150:11-20; 150:24-151:5, 151:7-13
164:13-18	Relevance	

Deposition of James T. McDaniel, Jr. September 29, 2006		
Andrew's Designations	TruePosition's Objections <sup>6</sup>	Counter Designations
7:7-9		
11:16-18		
13:3-21		
26:8-23		
49:12-14		48:9-12; 48:15-49:4

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<sup>5</sup> TruePosition objects to each and every designation of Mr. Magnusson's testimony as hearsay.

<sup>6</sup> TruePosition objects to each and every designation of Mr. McDaniel's testimony as hearsay.

49:16-23		50:3-11; 50:14-23
51:7-52:25		
53:15-18		
54:2-23		
160:14-20		161:16-162:2; 162:4
187:7-8		
187:12-188:18	Hearsay because ex. 93 is hearsay	
189:5-191:2	189:5-190:20 – Hearsay because ex. 93 is hearsay; 190:21-191:2 – Lacks personal knowledge	191:3-5
197:22-201:22	Hearsay because ex. 96 is hearsay	197:5-9
207:20-22	Hearsay because ex. 99 is hearsay	
209:23-211:12		
220:3-12		
220:17-18		
220:22-221:7	220:24-221:7 - Hearsay	
227:9-25		228:2-3; 228:5-19
228:20-23		
248:5-7		
248:11-13		
248:15-16		
249:12-20		
249:23-250:8		
250:11-25		
251:11-12		251:1-10
251:14-252:9		
253:18-25		

Deposition of Rhys W. Robinson November 15, 2006		
Andrew's Designations	TruePosition's Objections <sup>7</sup>	Counter Designations
4:15-21		
15:16-19		15:20-16:3
16:4-18:3		
18:18-19:8		18:4-8
19:25-20:19		19:9-21
20:21-21:23		20:20
22:7-12		
24:18-25:4	Hearsay, Relevance	
27:17-20	Relevance, Unfairly Prejudicial (FRE 403)	
31:14-18	Relevance, Unfairly Prejudicial (FRE 403)	
31:22-32:9	Relevance, Unfairly Prejudicial (FRE 403)	
33:11-14	Foundation	
33:19-21	Foundation	
33:24-34:5		
36:6-20	Foundation	
37:3-6		
37:9-11		
37:19-38:9	38:8-38:9 – Foundation	
38:12-14		
38:17-39:13		39:14-25
40:3-10		40:22-41:16
41:19-21		
41:24-42:4		

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<sup>7</sup> TruePosition objects to each and every designation of Mr. Robinson's testimony as hearsay.



42:7-12		42:13-20; 42:24-43:9; 44:9-25
46:18-48:17		
49:20-25		
50:18-51:18		
53:17-55:13	54:12 – Relevance 54:14-55:77 – Foundation	
57:3-60:12	57:3-59:7 Hearsay	
63:5-23	63:19-20 – Relevance, Unfairly Prejudicial (FRE 403); Hearsay  63:22-23 – Relevance, Unfairly Prejudicial (FRE 403); Hearsay	64:2-7
68:12-21	Privileged; Relevance; Unfairly Prejudicial (FRE 403); Hearsay	
69:6-9	Privileged; Relevance; Unfairly Prejudicial (FRE 403); Hearsay	
70:3-5		
70:11-13		
71:18-25		
72:23		
75:9-76:23	Relevance	76:24-77:6
79:14-80:2	Relevance	
82:9-16		81:16-82:8
83:12-13		
84:6-10		
88:2-89:5	Relevance	
90:3-11	Relevance	
90:16-19	Relevance	90:20-21
90:22-25	Relevance	
91:13-92:13	Relevance	
92:19-22	Relevance	

98:13-99:23	Relevance	
100:15-25		
101:11-102:2		
102:20-103:4		
104:5-105:20		
106:21-24		
107:4-8		
107:11-18		
107:25-108:18		117:6-117:19
119:11-24		
121:13-21		
121:24-122:5		
132:9-133:21	Relevance	

Deposition of John C. Webber October 4, 2006		
Andrew's Designations	TruePosition's Objections <sup>8</sup>	Counter Designations
5:17-19		
17:1-20:11		13:3-16:25; 20:12-21:3; 22:13-23:8
23:9-18		
23:24-24:13		
26:9-27:18		
28:12-22		
31:19-33:7		33:21-35:10
35:11-36:9		
46:11-48:2		53:4-23
61:14-17		
62:1-7		75:19-76:5

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<sup>8</sup> TruePosition objects to each designation as irrelevant to the extent Andrew seeks to use such designations in connection with the issue of claim construction.

69:9-70:20		70:21-71:15
73:22-74:6		
74:9-17		
74:20-23		
75:1-18		
89:10-13		87:19-22; 87:25-89:9
89:16-23		
90:13-18		
90:22-25		
91:1		
91:4-5		
91:9-12		
91:15-20		91:21-92:4
92:5-18		
111:19-112:17		
113:19-114:3		
120:15-121:10		
121:13-24		148:21-149:20
134:4-135:10		
137:9-25		

Deposition of Brian G. Agee, Ph.D January 24, 2007		
Andrew's Designations	TruePosition's Objections <sup>9</sup>	Counter Designations
5:12-19	Relevance	
3:3-4	Relevance	6:3-4
10:24-11:6		11:8-12:6

<sup>9</sup> TruePosition objects to each and every designation of Dr. Agee's testimony as hearsay. TruePosition also objects to each designation as irrelevant to the extent Andrew seeks to use such designations in connection with the issue of claim construction.

36:8-10		
37:8-15		37:16-38:14
38:15-18		38:19-39:2
41:1-24		
45:4-8		
45:15-23		45:24
45:25-46:2		
46:5-18		46:19
46:20		
48:2-5		48:7-8
69:3-8		
70:19-21		
71:9-11		71:15-16
73:25-74:1		74:2-3
74:4-6		
79:2-4	Legal conclusion	79:12-14
79:19-23	Legal conclusion	
84:3-6		
85:1-2		85:7
85:8		
100:3-5		100:10-11
100:12		
113:12-15		
125:8-14		
127:13-20		
132:16-21		
142:18-143:1		
143:11-15		
146:10-13	Legal Conclusion	146:14-15
146:24-147:5	Legal Conclusion	
149:10-15		

156:3-16	Relevance	
156:22-157:1	Relevance	

**TruePosition, Inc. v. Andrew Corporation, No. 05-747-SLR**  
**TruePosition's Objections and Counter-Designations to**  
**Andrew's Rebuttal Designations**

Deposition of Robert Gross October 12, 2006		
Andrew's Rebuttal Designations	TruePosition's Objections	Counter Designations
4:6-8		
13:2-21		
14:2-7		
14:11-13		
19:14-20:15		
21:17-22:12		
25:24-26:21		
31:2-5	FRE 602	
31:7		
31:10-14		
31:17-20		
33:22-25		
34:18-22		
36:12-23		
37:11-14		
37:21-38:3		45:23-50:22
50:23-51:23		
53:17-20		
53:23-54:3		
54:9-56:4		
68:9-21		
68:25-69:8		
71:18-72:7		
72:8-13		
72:16-22		
72:25-73:5		
73:8-13		
74:4-11		
76:20-24		
77:5-6		
77:20-22		
77:25-78:6		
78:10-15		
78:20-24		
81:21-83:11		
84:9-86:24		
87:3		

87:9-89:2		
91:8-21		
93:14-94:3		
96:18-20		

Deposition of Iris Inbar November 21, 2006		
Andrew's Rebuttal Designations	TruePosition's Objections	Counter Designations
12:15-24		
16:5-16		

Deposition of Joseph Kennedy 30(b)(6) Volume 2 October 17, 2006		
Andrew's Rebuttal Designations	TruePosition's Objections <sup>10</sup>	Counter Designations
265:22-266:15		

Deposition of Joseph Kennedy Personal October 17, 2006		
Andrew's Rebuttal Designations	TruePosition's Objections <sup>11</sup>	Counter Designations
30:11-13		
30:16-23		

Deposition of Joseph Kennedy 2 <sup>nd</sup> Rule 30(b)(6) November 9, 2006		
Andrew's Rebuttal Designations	TruePosition's Objections <sup>12</sup>	Counter Designations
53:20-23		
53:24-54:17		

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<sup>10</sup> TruePosition objects to each and every designation of Mr. Kennedy's testimony as hearsay.

<sup>11</sup> TruePosition objects to each and every designation of Mr. Kennedy's testimony as hearsay.

<sup>12</sup> TruePosition objects to each and every designation of Mr. Kennedy's testimony as hearsay.

Deposition of Oskar Magnusson Personal November 8, 2006		
Andrew's Rebuttal Designations	TruePosition's Objections <sup>13</sup>	Counter Designations
44:9-18		
44:20		
44:22-25		

Deposition of Oskar Magnusson 30(b)(6) November 8, 2006		
Andrew's Rebuttal Designations	TruePosition's Objections <sup>14</sup>	Counter Designations
124:15-132:18	FRE 802	
146:6-147:7		
147:21-148:13		
148:16-25		
164:13-18		
164:21-165:16		
170:24-171:16		
173:23-175:3		
175:17-176:25		
189:5-7		

Deposition of James McDaniel September 29, 2006		
Andrew's Rebuttal Designations	TruePosition's Objections <sup>15</sup>	Counter Designations
49:12-14		
49:16-23		
187:7-8		
187:12-18		
189:5-191:2		
207:20-22		

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<sup>13</sup> TruePosition objects to each and every designation of Mr. Magnusson's testimony as hearsay.

<sup>14</sup> TruePosition objects to each and every designation of Mr. Magnusson's testimony as hearsay.

<sup>15</sup> TruePosition objects to each and every designation of Mr. McDaniel's testimony as hearsay.



209:23-211:12		
227:9-25		
228:20-23		